

EXHIBIT 2

From: James Kolenich
To: [Julie Fink](#)
Subject: Re: Sines et al. v. Kessler et al.
Date: Wednesday, March 14, 2018 8:27:08 AM

Good Morning. I have read the Gab and other common alt-right feeds. I don't know anymore about this situation than you. The only post incident communication from that group has been a request that I meet with Heimbach late this afternoon, which I will do, even if the meeting has to be at a jail. I will update you then.

I understand that you have to file what you think best for your case.

Jim

On Tue, Mar 13, 2018, 11:17 PM Julie Fink <jfink@kaplanandcompany.com> wrote:

Messrs. Kolenich and Woodard,

In the attached message posted to Gab, your client Matt Parrott states his intention to destroy documents and information directly relevant to Plaintiffs' claims against him and TWP, in violation of both of their legal obligations. Specifically, he writes: "All of the information systems are completely air-gapped and will be destroyed within a few hours in order to guarantee all membership information literally no longer exists anywhere."

Please confirm by 9am tomorrow morning that Mr. Parrott has not destroyed and will take steps to preserve any and all such documents and information, or we will seek immediate relief from the Court.

Julie E. Fink | Kaplan & Company, LLP

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jfink@kaplanandcompany.com

From: James Kolenich [mailto:jek318@gmail.com]

Sent: Monday, March 12, 2018 10:52 PM
To: Seguin Strohmeier <sstrohmeier@kaplanandcompany.com>
Cc: Elmer Woodard <isuecrooks@comcast.net>; Julie Fink <jfink@kaplanandcompany.com>; Roberta Kaplan <rkaplan@kaplanandcompany.com>; Christopher Greene <cgreene@kaplanandcompany.com>; Karen Dunn <KDunn@bsflp.com>; Levine, Alan <alevine@cooley.com>
Subject: Re: Sines et al. v. Kessler et al.

Ms. Strohmeier:

Thank you for your letter of March 9, 2018. Due to the press of other business my clients will be unable to respond to discovery by March 23. We can respond by April 6, 2018. In addition we decline your request to have each client provide written verification of their compliance with what is already a legal obligation.

Respectfully,

Jim Kolenich

On Fri, Mar 9, 2018 at 7:08 PM, Seguin Strohmeier <sstrohmeier@kaplanandcompany.com> wrote:

Mssrs. Woodard and Kolenich:

Please see the attached correspondence.

Seguin L. Strohmeier

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